

1 Bryan L. P. Saalfeld - 243331

[BSaalfeld@mpbf.com](mailto:BSaalfeld@mpbf.com)

2 MURPHY, PEARSON, BRADLEY & FEENEY

580 California Street, Suite 1100

3 San Francisco, CA 94104-1001

Telephone: (415) 788-1900

4 Facsimile: (415) 393-8087

5 Attorneys for Plaintiffs

DAKAVIA MANAGEMENT CORP.,

6 MONTE VISTA ESTATES, LLC; and

LAMAR ESTATES, LLC

8 **UNITED STATES DISTRICT COURT**

9 **EASTERN DISTRICT OF CALIFORNIA**

10 DAKAVIA MANAGEMENT CORP., an  
11 Oregon Corporation; MONTE VISTA  
12 ESTATES, LLC, a Colorado Limited Liability  
13 Company; and LAMAR ESTATES, LLC, a  
Colorado Limited Liability Company,

14 Plaintiffs,

15 v.

16 BRANDON BIGELOW, an individual,  
17 CURTIS BIGELOW, an individual RICHARD  
18 A. GREEN, an individual, RAZMIK  
19 ZAKARIAN, an individual, INVIGORATE  
20 HEALTHCARE, INC., a California  
21 Corporation, INVIGORATE HEALTHCARE,  
22 LLC, a California Limited Liability Company,  
23 INVIGORATE HEALTHCARE  
24 MANAGEMENT, LLC, a California Limited  
25 Liability Company, MONTE VISTA CARE  
26 HOLDINGS, LLC, a California Limited  
Liability Company, LAMAR HOLDINGS,  
LLC, a California Limited Liability Company,  
LTC MANAGEMENT HOLDINGS, LLC, a  
California Limited Liability Company, SNF  
PAYROLL, LLC, a California Limited Liability  
Company, SNF MANAGEMENT, LLC, a  
Delaware Limited Liability Company, and  
CHAIM RASKIN, an individual,

Defendants.

Case No.: 1:20-cv-00448-JLT-SKO

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
FILE THIRD AMENDED COMPLAINT**

(Doc. 90)

Judge: Hon. Judge Sheila K. Oberto

27 **TO THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF**  
28 **CALIFORNIA:**

1 On February 8, 2022, Plaintiffs DAKAVIA MANAGEMENT CORP.; MONTE VISTA  
2 ESTATES, LLC; and LAMAR ESTATES, LLC, and defendants RICHARD A. GREEN, an  
3 individual, RAZMIK ZAKARIAN; LTC MANAGEMENT HOLDINGS, LLC, SNF PAYROLL,  
4 LLC, SNF MANAGEMENT, LLC and CHAIM RASKIN (hereafter collectively the “parties”)  
5 filed a stipulation to continue the February 22, 2022 Scheduling Conference to permit Plaintiffs  
6 filing of the Third Amended Complaint and sufficient time for Defendants to evaluate and  
7 respond, so that the parties can present to the Court an efficient and realistic joint scheduling report  
8 for the Court’s approval. [Dkt.88.] The Court granted the Stipulation and Order on February 10,  
9 2022, continuing the Scheduling Conference until April 19, 2022. [Dkt.89.]

10 Plaintiffs now respectfully seek an additional week until February 25, 2022, to file their Third  
11 Amended Complaint. Good cause supports this stipulation, as Plaintiffs have been attending to a  
12 Covid-19 Omicron outbreak at one of their facilities and require additional time to evaluate and  
13 finalize whether to remove certain claims and parties from its forthcoming Third Amended Complaint.  
14 Plaintiffs seek streamline the pleadings to narrow the issues and allow the matter to proceed more  
15 efficiently. The parties’ consent and stipulate (subject to Court approval).

16 DATED: February 22, 2022

17 MURPHY, PEARSON, BRADLEY & FEENEY

18  
19 By /s/ Bryan L.P. Saalfeld  
20 Bryan L. P. Saalfeld  
21 Abraham M. Andrade III  
22 Attorneys for Plaintiffs  
23 DAKAVIA MANAGEMENT CORP.,  
24 MONTE VISTA ESTATES, LLC and  
25 LAMAR ESTATES, LLC  
26  
27  
28

1 DATED: February 22, 2022

FOLEY & LARDNER LLP

2  
3  
4 By /s/ Nicholas M. Gross  
Nicholas M. Gross  
Attorneys for Defendants  
5 LTC MANAGEMENT HOLDINGS, LLC, a  
California Limited Liability Company, SNF  
6 PAYROLL, LLC, a California Limited Liability  
Company, SNF MANAGEMENT, LLC, a  
7 Delaware Limited Liability Company (erroneously  
sued as a California Limited Liability Company),  
8 and CHAIM RASKIN  
9

10 DATED: February 22, 2022

WHITNEY THOMPSON & JEFFCOACH

11  
12  
13 By /s/ Mandy L. Jeffcoach  
Timothy Thompson  
Mandy Jeffcoach  
14 Attorneys for Defendants  
15 RICHARD A. GREEN, an individual, RAZMIK  
ZAKARIAN  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

Pursuant to the parties' foregoing stipulation (Doc. 90), and for good cause shown,

IT IS HEREBY ORDERED that the deadline for Plaintiffs to file a Third Amended Complaint is extended to February 25, 2022.

IT IS SO ORDERED.

Dated: **February 22, 2022**

*/s/ Sheila K. Oberto*  
UNITED STATES MAGISTRATE JUDGE